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Before the

FEDERAL COMMUNICATIONS COMMISSION

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Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In Re Applications of)	MM Docket No. 93-75
)	
TRINITY BROADCASTING OF FLORIDA,)	
INC.)	BRCT-911001LY
)	
For Renewal of License of)	
Television Station WHFT(TV))	
Miami, Florida)	
)	
GLENDAL E BROADCASTING COMPANY)	BPCT-911227KE
)	
For Construction Permit)	
Miami, Florida)	

To: Hon. Joseph Chachkin
Administrative Law Judge

**COMMENTS ON
PETITION FOR LEAVE TO AMEND**

Trinity Broadcasting of Florida, Inc. ("TBF"), by its counsel, submits the following comments on the "Petition for Leave To Amend" filed June 29, 1993, by Glendale Broadcasting Company ("Glendale").

1. Glendale's amendment reports the fact that in March 1992 Raystay Company assigned the LPTV construction permit W23AY, York, Pennsylvania, after the Commission granted the assignment application. The amendment also reports that on February 28, 1992, Glendale filed an application for a construction permit for new commercial television station on Channel 63, Monroe, Georgia (BPCT-920228KE).

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2. While Glendale had previously reported the filing of the W23AY assignment application (see Glendale amendment filed February 13, 1992), it never amended to report either the grant thereof or the consummation of the assignment. These reporting derelictions (among many others) were recently raised by TBF in its "Contingent Motion To Enlarge Issues Against Glendale Broadcasting Company," filed May 13, 1993. Responding to that motion, Glendale defended its failure to report consummation of the W23AY assignment by claiming that once the application for assignment had been reported, "the obligation to further report anything was unclear."^{1/} While Glendale now repeats that claim (Petition, p. 2), Glendale's very filing of this amendment is a (belated) concession that the grant and consummation of the W23AY assignment were reportable.

3. Likewise, Glendale's belated reporting of the 1992 filing of the Monroe, Georgia, application (BPCT-920228KE) is obviously prompted by TBF's contingent motion to enlarge. Glendale characterizes its reporting failure on this matter as an "inadvertent oversight." Petition, p. 2.

4. TBF does not oppose Glendale's amendment, since Glendale disclaims any comparative advantage and the information in the amendment is plainly required by §1.65 (as TBF pointed

^{1/} See, Glendale's "Opposition to Contingent Motion To Enlarge Issues Against Glendale Broadcasting Company," filed June 7, 1993, p. 15.

out in its contingent motion to enlarge). However, TBF is constrained to make two points. First, the amendment omits more than twenty other reportable matters that TBF identified in its motion. Second, the filing of this amendment does nothing to

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July 1, 1993

CERTIFICATE OF SERVICE

I, Nathaniel F. Emmons of the law firm of Mullin, Rhyne, Emmons and Topel, P.C., hereby certify that on this 1st day of July, 1993, copies of the foregoing "Comments on Petition for Leave To Amend" were sent by first class mail, postage prepaid, to the following:

- * The Honorable Joseph Chachkin
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